

Affidavit of Colleen Vera

Colleen Vera, appeared in person before me today and stated under oath:

"My name is Colleen Vera. I am above the age of eighteen and am fully competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are correct.

"I am a duly appointed alternate judge for the Central Count Team.

The morning of October 31, 2020, the Central Count Team from both parties began receiving the Judge's Booth Controllers ("JBC") from early voting. The process began normally. The county clerk staff opened a JBC box in front of us, cut the seal to the MBB compartment, removed the MBB and determined the number of ballots on each MBB. The members of the Central Count Team recorded the number of votes on each MBB.

When the first box arrived from a drive-thru voting center, the County Clerk's Director of Elections, Michael Winn, stopped the process. He announced that they had chosen to make a new MMB card directly from the e-slates at each drive-through-voting location and would be using it in place of the MBBs from the JBCs. This would be the process for all drive-through-voting locations. It was explained that using the votes stored on the e-slates was the best way to ensure the vote count was accurate. He did not explain how he had determined that the vote count on the JBCs from all drive-through-voting locations was not accurate since the JBCs were still sealed and would not be opened to remove the MBB cards inside.

In the place of opening the JBCs for each drive-through-voting-location, we were shown a printout listing the number of votes on the e-slate from 8 of the 10 locations with the total number of votes cast at each. Neither I nor my Republican colleague on the Central Count Team were given the opportunity to witness the extraction of the votes from the e-slates or shown any chain of custody documentation for those e-slates. We were not told when we would receive the results from the other two locations.

I compiled the chart below based on (1) e-slate print outs provided by the county clerk on October 31, 2020 (2) voter roster data posted by the county clerk on-line as of October 31, 2020, and (3) the daily record data posted by the county clerk after the polls closed on October 30, 2020. As demonstrated below, there are significant disparities between the e-slate ballot data from the drive-thru locations and the number of voters reported on the roster and the daily records.

EXHIBIT

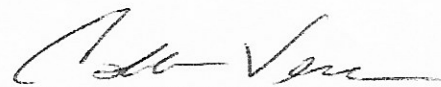
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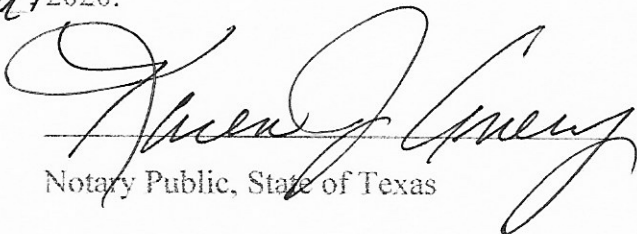
Harris County Drive-Through-Voting Location Numbers

Location	E-Slates	Roster	More Votes Than Voter Names on Roster	Daily Record	More Votes Than Voter Number on Daily Record
DTV 131K	5,775	5,748	+27	5,745	+30
DTV 134W	18,778	18,676	+102	18,674	+104
DTV 139F	18,827	18,926	(-99)	18,909	(-17)
DTV 141U		19,210		19,161	
DTV 142H	2,743	2,725	+18	2,724	+19
DTV 145C	8,433	8,250	+183	8,245	+188
DTV 146N	19,871	19,360	+511	19,349	+522
DTV 147C		11,623		11,617	
DTV 148Z	10,373	10,342	+31	10,337	+37
DTV 149H	12,328	12,161	+167	12,151	+177

FURTHER AFFIANT SAYET NOT



Colleen Vera

Signed Under Oath before me on November 1 2020.

 Notary Public, State of Texas
